UNITED STATES OF AMERICA FILED DISTRICT OF MASSACHUSETTS

2005 FEB 24 P 1:58

NOS: DISTRICT COURT DISTRICT OF MASS

LLOYD F. AUDETTE, Plaintiff,

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UMASS CORRECTIONAL HEALTH,
A Commonwealth Medicine Program,
Defendant, and

DEPARTMENT OF CORRECTION,
Kathleen M. Dennehy, Commissioner,
Defendant,

## MOTION TO APPOINT COUNSEL

Now comes the Plaintiff, Lloyd F. Audette in the above entitled matter and respectfully requests that this Honorable Court appoin counsel free of charge to the Plaintiff.

As grounds for this motion the Plaintiff states the following:

- 1. I am incarcerated and indigent
- 2. I suffer from severe life threatening diseases as stated in my complaint and do not always have the energy to pursue and perform certain tasks including legal research and motion preparation.
- 3. The allegations set forth in this complaint state that I am being deprived of medical treatment and my life as well as health are at jeopardy and the issues are complicated.
- 4. I do not possess the proper legal training to fully pursue this complaint in an adequate manner and counsel

is needed to adequately adjudicate my claims properly.

5. I am deemed to be 100% disabled by the Social Security Administration.

Wherefore, Plaintiff requests that counsel be appointed to preserve his legal rights and health, life and liberty.

Dated: 2-16-05

Respectfully submitted, By the Plaintiff,

Lloyd F. Audett

Pro-se

S.B.C.C./P.O. Box 8000 Shirley MA 01464